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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **OAKLAND DIVISION**

14 IN RE STATIC RANDOM ACCESS
MEMORY (SRAM) ANTITRUST
15 LITIGATION

Case No. M:07-CV-01819-CW

MDL No. 1819

16
17 This Document Relates to:
18 ALL INDIRECT PURCHASER ACTIONS
19

**STIPULATION &
ORDER EXTENDING TIME TO
FILE MOTION FOR CLASS
CERTIFICATION**

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21 WHEREAS, on June 1, 2007, a Case Management Conference was held before the
22 Court in the coordinated proceedings *In re Static Random Access Memory (SRAM)*
23 *Litigation*, Case No. M:07-cv-1819-CW;

24 WHEREAS, the Court's CMC order dated June 8, 2007, requires the Indirect-
25 Purchaser Plaintiffs to file their Motion for Class Certification and Expert Reports in support
26 thereof on *February 15, 2008* with Defendants' Opposition to be filed on *April 17, 2008*, and
27 the Indirect-Purchaser Plaintiffs' Reply to be filed on *May 1, 2008*;

1 WHEREAS, Indirect-Purchaser Plaintiffs filed their First Amended Consolidated
2 Class Action Complaint (“CAC”) on August 31, 2007, and Defendants filed their Motions to
3 Dismiss the CAC on October 22, 2007;

4 WHEREAS, a hearing was held before this Court regarding Defendants’ Motions to
5 Dismiss on December 20, 2007;

6 WHEREAS, the Court’s December 20, 2007 Minute Order from the Motion to
7 Dismiss hearing stated, “After Court issues order on motions [to dismiss], counsel to meet
8 and confer re adjusting CMC dates for class certification;”

9 WHEREAS, on February 14, 2008, the Court issued an Order granting in part and
10 denying in part the Defendants’ Motion to Dismiss the CAC and provided that the Indirect-
11 Purchaser Plaintiffs may file an amended complaint;

12 WHEREAS the Indirect-Purchaser Plaintiffs intend to file a second amended
13 complaint within twenty-one (21) days of this Court’s Order;

14 NOW THEREFORE, it is hereby stipulated by the undersigned counsel on behalf of
15 the Parties identified below, and subject to the Court’s approval, that the deadline for the
16 Indirect Purchaser Plaintiffs to file a Motion for Class Certification, Expert Reports in
17 support thereof, as well as Oppositions and Replies to such a Motion, are amended as
18 follows:

19 1. Indirect-Purchaser Plaintiffs shall file their Motion for Class Certification and
20 Expert Reports in support thereof ninety (90) days after the pleadings are settled between the
21 Indirect-Purchaser Plaintiffs and the Defendants¹, without prejudice to Indirect-Purchaser
22 Plaintiffs’ ability to request additional time to file their Motion for Class Certification and
23 Expert Report(s) in support thereof and Defendants’ right to oppose such request

24 2. Defendants’ Oppositions to the Indirect-Purchaser Plaintiffs’ Motion for Class
25 Certification shall be filed sixty (60) days after the filing of the Indirect-Purchaser Plaintiffs’
26

27 ¹ Defendants, as the term is used here, includes only those domestic Defendants who had
28 been served with the CAC and/or filed or joined any of the pending Motions to Dismiss. The
term does not include foreign Defendants, so any challenge any foreign Defendant may raise
to any Indirect-Purchaser Plaintiffs’ complaint does not, by this stipulation, effect the date for
filing the Motion for Class Certification.

1 Motion for Class Certification.

2 3. Indirect-Purchaser Plaintiffs' Reply shall be filed twenty-one (21) days after
3 filing of the Defendants' Oppositions to the Indirect-Purchaser Plaintiffs' Motion for Class
4 Certification.

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6 Dated: February 15, 2008

By: /s/ Craig C. Corbitt
Craig C. Corbitt

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24 *Liaison Counsel for Defendants*
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1 **IT IS SO ORDERED.**

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3 Dated 3/10 , 2008



The Honorable Claudia Wilken
United States District Judge

Northern District of California